

United States District Court
Northern District of California

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

Case No. 18-cv-06753-PJH

This Document Relates To:
ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER GRANTING
ADMINISTRATIVE MOTION TO
RELATE AND CONSOLIDATE
CASES FOR PRETRIAL PURPOSES**

Pursuant to Civ. L.R. 7-11(a) and 7-12, the undersigned parties hereby stipulate as follows:

WHEREAS, on July 27, 2020, the case captioned *Simmons v. Ripple Labs, Inc.*, No. 20-cv-5127-KAW, was transferred to this District from the Southern District of New York, *Simmons*, ECF 16 at 1;

WHEREAS, the complaint in *Simmons* involves claims, allegations, and parties that are substantially similar to the operative complaint in *In re Ripple Labs Litigation*;

WHEREAS, all the affected parties in both actions—specifically, Defendants Ripple Labs Inc., XRP II LLC, and Bradley Garlinghouse, Lead Plaintiff Bradley Sostack, and Plaintiff Daniel Simmons—hereby stipulate that *Simmons* is related to the putative class action *In re Ripple Labs Litigation* pending before the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Lead Plaintiff Bradley Sostack, Plaintiff Daniel Simmons, and Defendants Ripple Labs, Inc., XRP II LLC, and Bradley Garlinghouse, through their respective counsel, that:

1. The *Simmons* action is related to *In re Ripple Labs Litigation* and, under the Court’s standing order, Dkt. 35 at ¶¶ 6-7, that it should be consolidated therewith.

Dated: August 6, 2020

By: /s/ P. Ryan Burningham
P. Ryan Burningham (*pro hac vice*)
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By: /s/ Menno Goedman
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By: /s/ Ross E. Pitcoff
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New York, NY 10016

*Counsel for Plaintiff
Daniel Simmons*

Pursuant to the foregoing stipulation, **IT IS SO ORDERED.**

Dated: _____
Phyllis J. Hamilton
UNITED STATES DISTRICT JUDGE

SIGNATURE ATTESTATION

I, Menno Goedman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized its filing.

By: /s/ Menno Goedman
Menno Goedman